

TIN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: BRYAN SCOTT KENNEDY

CHAPTER 13 BANKRUPTCY
CASE NO. 17-02921-NPO

OBJECTION TO SECURED CLAIM(S) AND OTHER RELIEF

COME(S) NOW, Debtor(s), by and through counsel, and file(s) this Objection to the following pre-petition secured claim(s) and request(s) the Court to determine the treatment of the following collateral for the purpose of plan confirmation:

CREDITOR: PRIORITY ONE BANK
P.O. BOX 18409
HATTIESBURG, MS 39404

Description of Collateral: LAWN TRACTOR

Alleged Amount Owed: \$3,379.27 Value: \$6,000.00

Treatment: Pay the amount owed of \$3,379.27 plus 5% interest over the life of the Chapter 13 Plan; or, in the event a timely filed and/or allowed Proof of claim is filed by or on behalf of this creditor evidencing a purchase-money security interest and that the personal property loan was acquired less than one year before the petition filing, pay the amount owed as set forth in such claim plus 5% interest over the life of the Chapter 13 plan; or, in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of this creditor evidencing a purchase-money security interest and that the personal property loan was acquired more than one year before the petition filing, then pay the value of \$6,000.00 plus 5% interest over the life of the plan unless the amount as set forth in such claim is less than the value of \$6,000.00.

Debtor(s) pray(s) that in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of any of the above mentioned creditors evidencing an unsecured interest, that said creditor be paid the same percentage distribution as all other unsecured creditors through the Chapter 13 plan and further pray(s) that either upon payment of the underlying debts determined under non-bankruptcy law or a discharge under Bankruptcy Code § 1328, all liens be cancelled and any and all title documents be promptly delivered to Debtor(s).

DATED: October 17, 2017.

/S/ Elizabeth Johnson Spell
Elizabeth Johnson Spell, MSB #102317

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